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June 27, 2022

Via ECF

Honorable Mary K. Vyskocil
United States District Judge
United State District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States of America v. Cesar Cruz
Case No.: 21-CR-00504(MKV)

Your Honor:

This office represents Cesar Cruz, the Defendant in the above referenced matter which is currently on the Court's calendar for a conference and possible plea on June 30th. For a number of reasons, including the need to save Mr. Cruz's seasonal charter business from financial devastation, Mr. Cruz will not be able to enter a plea until after Labor Day.

We have discussed this request with the AUSA Kaylan Lasky and AUSA Kedar Bhatia and they do not object to the requested adjournment. Therefore, we respectfully request that the Court adjourn this matter for a plea or further proceeding to a day after September 12. We further request that the time between now and the next adjourn date be excluded pursuant to the Speedy Trial Act.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,


John Russo

John L. Russo (JR6200)

Cc: AUSA Kaylan Lasky (Via E-mail)
AUSA Kedar Bhatia (Via E-Mail)

This request to adjourn the change of plea hearing is GRANTED. The hearing will take place on September 12, 2022 at 10:30 a.m. All time is excluded until that date.

Date: June 27, 2022
New York, New York


Mary Kay Vyskocil
United States District Judge